

B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----X
PAUL T. PAPADAKIS,
 Plaintiff, : CIVIL ACTION
 : NO.04-30189-MAP
-vs- :
CSX TRANSPORTATION, INC., :
 Defendant
-----X

**PLAINTIFF'S FIRST SET OF INTERROGATORIES TO THE
DEFENDANT, CSX TRANSPORTATION, INC.**

Now comes the plaintiff in the above-entitled action, pursuant to Rule 33 of the Federal Rules of Civil Procedure, and propounds the following interrogatories to be answered under oath by the defendant:

1. Please provide the names and addresses of all employees of the defendant near the plaintiff at the time of the accident.
2. Please identify the person answering the interrogatories, stating name, address, title or position held with the defendant company and a summary of the employment history with the defendant company.
3. Please describe in detail the nature of the plaintiff's assigned duties on June 13, 2001.
4. Please identify with specificity all devices, equipment, tools and vehicles provided to the plaintiff by the defendant to be used by the plaintiff in the performance of his assigned duties on June 13, 2001.

5. Please identify by name, address and position with the defendant the members of the Safety Committee responsible for maintenance of the safe work practices and safety rule compliance at or about the location of the plaintiff's accident and/or in the area on and prior to June 13, 2001.
6. Please identify any employee of the defendant who inspected, maintained and/or repaired the subject vehicle or any component thereof or identify hy-rail vehicle by # attachment thereto including but not limited to it's hy-rail equipment within the 12 month period of the alleged incident of June 13, 2001.
7. Please identify by name and address each person who has knowledge of the manner of the happening of the plaintiff's accident, the medical treatment undergone by the plaintiff on, after and before the accident, and any prior physical or mental condition of the plaintiff and of damages claimed by the plaintiff to have resulted from the accident of June 13, 2001.
8. Please identify any non-employee individual or company who inspected, maintained and/or repaired the subject vehicle or any component thereof or attachment thereto including but not limited to it's hy-rail equipment within the 12 month period of the alleged incident of June 13, 2001.
9. If the defendant has arranged for surveillance of the plaintiff from and after September 30, 1999, please provide:
 - (a) Names, addresses and relationship with the defendant of the persons who conducted this interview;
 - (b) The dates of surveillances;
 - (c) A description of any report provided the defendant concerning surveillance of the plaintiff.